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November 22, 2023

The Honorable Cathy Seibel
United States District Court Judge
United States District Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**RE: *The Wave Studio, LLC v. Amadeus North America, Inc., et al.*,
S.D.N.Y. Case No. 7:15-cv-06995-CS-PED**

Dear Judge Seibel:

We represent Defendant Cathay Pacific Airways Ltd. (“Cathay”) in the above-referenced action.¹ We write in response to the letter filed by counsel for Plaintiff The Wave Studio, LLC (“Plaintiff”) on November 7, 2023 [Dkt. 88], in which Plaintiff sought a pre-motion conference regarding a motion to lift the stay that has been in place in this action since 2015, and the Court’s November 7, 2023 Order [Dkt. 89] setting a conference in response.

Earlier today, counsel for Defendant General Hotel Management Ltd. (“GHM”) filed a letter in a related consolidated action (Case No. 7:13-cv-09239-CS-PED, the “GHM Action”) [GHM Action, Dkt. 300]. Cathay joins in GHM’s response to Plaintiff’s letter of November 7, 2023, and respectfully supports the process outlined in the letter and opposes lifting of the stay pending completion of that process.

In the event that the Court declines to follow the process proposed in GHM’s letter and ultimately orders a lifting of the stay, Cathay respectfully requests that the Court enter a scheduling order that provides Cathay with at least sixty (60) days to respond to the operative complaint.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ *Eric M. Ferrante*

Eric M. Ferrante

cc: All counsel of record via ECF

¹ This letter is not intended to constitute a general appearance or a waiver of any rights. Cathay reserves all rights in connection with the above-referenced action.